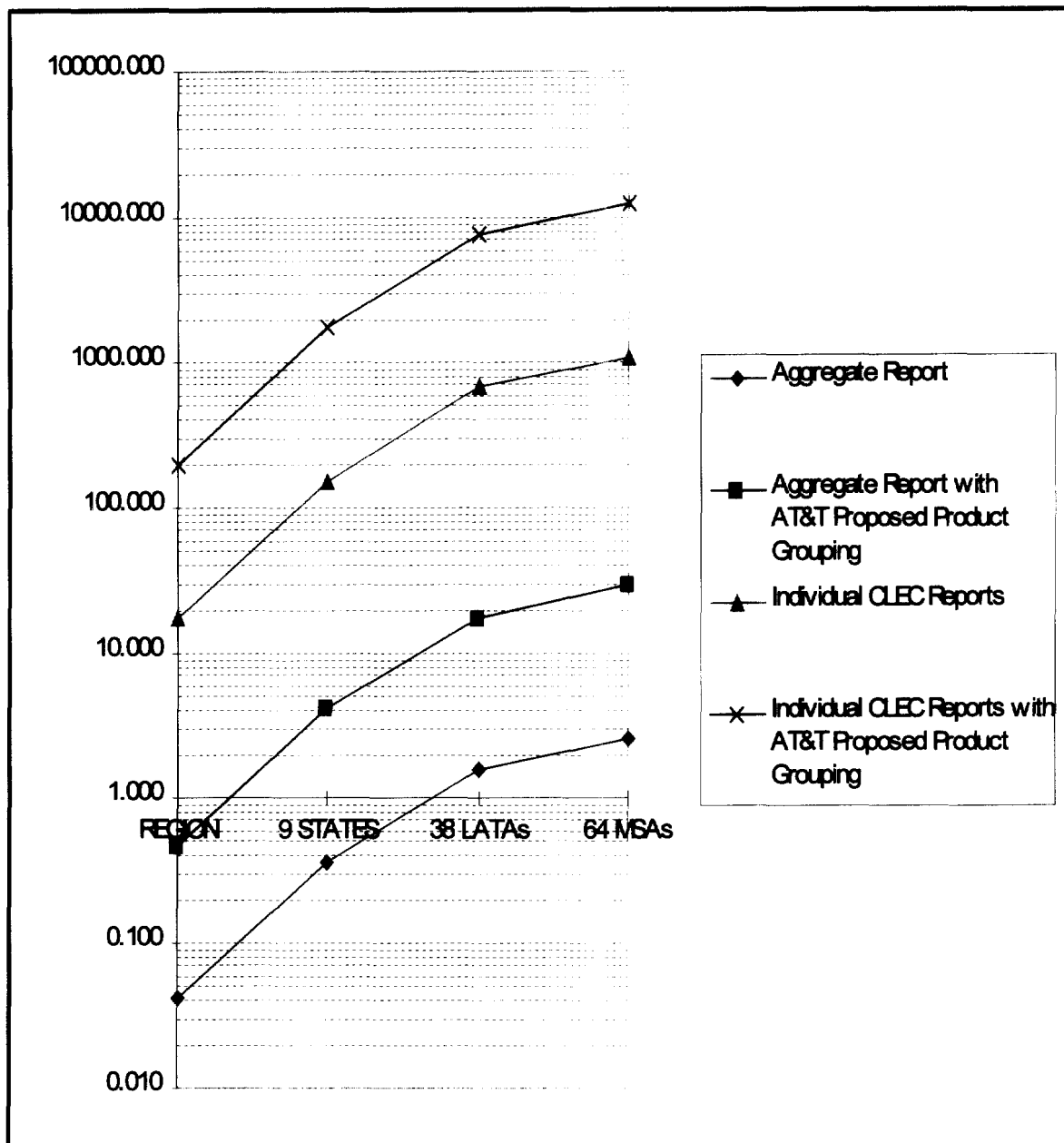


**FCC NPRM Performance Measurements Disaggregation  
Comparison Chart  
(X1000)**



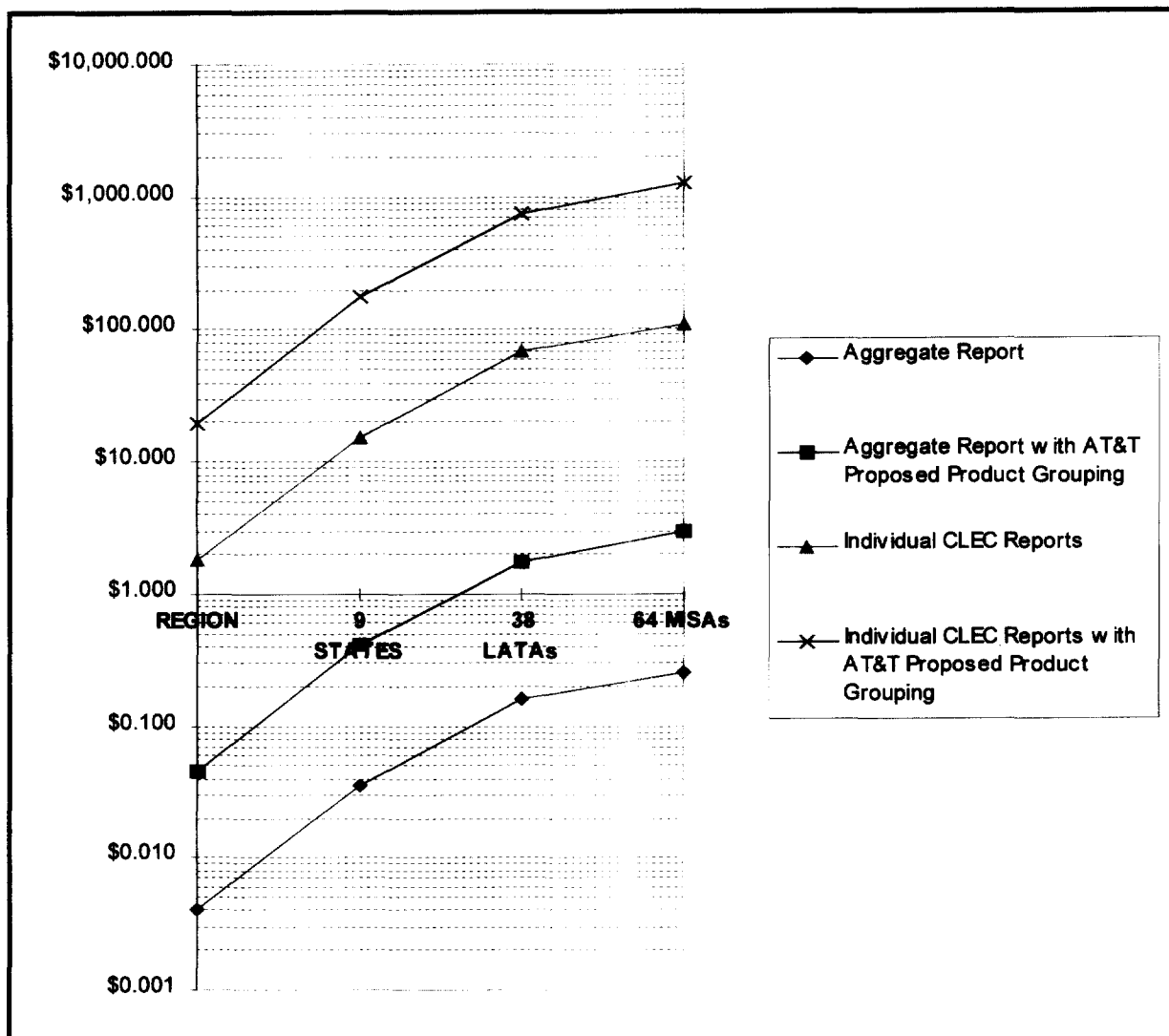
	REGION	9 STATES	38 LATAs	64 MSAs
Aggregate Report	0.041	0.356	1.600	2.534
Aggregate Report with AT&T Proposed Product Grouping	0.463	4.163	17.579	29.606
Individual CLEC Reports	17.761	152.896	686.314	1087.258
Individual CLEC Reports with AT&T Proposed Product Grouping	198.455	1786.099	7541.305	12701.145

BellSouth currently has contracts with 429 CLECs

Figure 4

**FCC NPRM Performance Measurements Disaggregation  
Comparison Chart  
(X1000)**

**Cost Chart based on \$.10 per Data Element per Month**



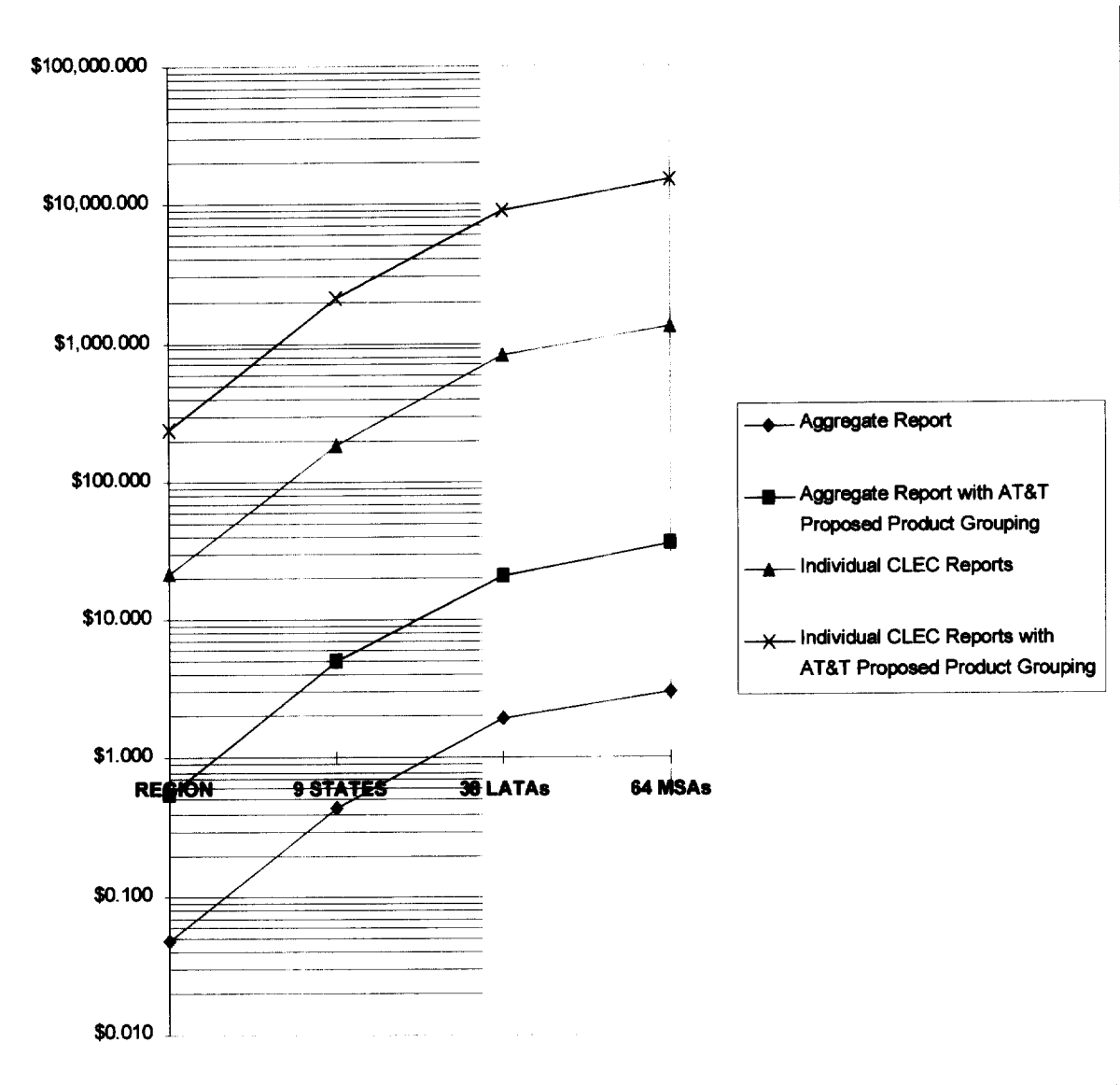
	REGION	9 STATES	38 LATAs	64 MSAs
Aggregate Report	\$0.004	\$0.036	\$0.160	\$0.253
Aggregate Report with AT&T Proposed Product Grouping	\$0.046	\$0.416	\$1.758	\$2.961
Individual CLEC Reports	\$1.776	\$15.290	\$68.631	\$108.726
Individual CLEC Reports with AT&T Proposed Product Grouping	\$19.846	\$178.610	\$754.131	\$1,270.115

BellSouth currently has contracts with 429 CLECs

Figure 5

**FCC NPRM Performance Measurements Disaggregation  
Comparison Chart  
(X1000)**

**Yearly Cost Chart based on \$.10 per Data Element**



BellSouth currently has contracts with 429 CLECs

Figure 6

**FCC NPRM Performance Measurements Disaggregation  
Comparison Chart  
(X1000)**

	<b>REGION</b>	<b>9 STATES</b>	<b>38 LATAs</b>	<b>64 MSAs</b>
<b>Aggregate Report</b>	<b>\$0.048</b>	<b>\$0.432</b>	<b>\$1.920</b>	<b>\$3.036</b>
<b>Aggregate Report with AT&amp;T Proposed Product Grouping</b>	<b>\$0.552</b>	<b>\$4.992</b>	<b>\$21.096</b>	<b>\$35.532</b>
<b>Individual CLEC Reports</b>	<b>\$21.312</b>	<b>\$183.480</b>	<b>\$823.572</b>	<b>\$1,304.712</b>
<b>Individual CLEC Reports with AT&amp;T Proposed Product Grouping</b>	<b>\$238.152</b>	<b>\$2,143.320</b>	<b>\$9,049.572</b>	<b>\$15,241.380</b>

BellSouth currently has contracts with 429 CLECs

Figure 7

## CERTIFICATE OF SERVICE

I hereby certify that I have this 6th day of July, 1998 served the following parties to this action with a copy of the foregoing **BELLSOUTH CORPORATION REPLY COMMENTS** by placing a true and correct copy of the same in the United States Mail, postage prepaid, addressed to the parties at the addresses shown below :

Magalie Salas\*\*  
Office of the Secretary  
Federal Communications Commission  
1919 M Street, NW; Room 222  
Washington, DC 20554

International Transcription Services,  
Inc.\*\*  
1231 20th Street, NW  
Washington, DC 20036

Janice Myles (with diskette)\*\*  
Common Carrier Bureau  
1919 M Street NW, Room 544  
Washington, DC 20554

Michael J. Shortley, III  
Senior Attorney and Director  
Regulatory Services  
Frontier Corporation  
180 South Clinton Avenue  
Rochester, NY 14646

Steve Davis, Director  
Office of Policy Development  
Public Utility Commission of Texas  
1701 North Congress Avenue  
P. O. Box 13326  
Austin, TX 78711-3326

Rodney L. Joyce  
J. Thomas Nolan  
Shook, Hardy & Bacon  
Attys for Network Access Solutions, Inc.  
801 Pennsylvania Avenue, NW  
Washington, DC 20004-2615

Lawrence G. Malone  
General Counsel  
Public Service Commission of  
the State of New York  
Three Empire State Plaza  
Albany, NY 12223-1350

Robert W. McCausland  
Vice-President, Regulatory and  
Interconnection  
Allegiance Telecom, Inc.  
1950 Stemmons Freeway; Suite 3026  
Dallas, TX 75207-3118

Richard J. Metzger  
Emily M. Williams  
Association for Local Telecommuni-  
cations Services  
888 17th Street, NW, Suite 900  
Washington, DC 20036

Carolyn C. Hill  
ALLTEL Communications Services  
Corporation  
655 15th Street, NW; Suite 220  
Washington, DC 20005

Theodore A. Livingston  
John E. Muench  
Christian F. Binnig  
Demetrios G. Metropoulos  
Attorneys for Ameritech Corporation  
Mayer, Brown & Platt  
190 South LaSalle Street  
Chicago, IL 60603

John T. Lenahan  
Larry A. Peck  
Ameritech Corporation  
30 South Wacker Drive  
Chicago, IL 60606

Mark C. Rosenblum  
Leonard J. Cali  
Richard H. Rubin  
AT&T Corp.  
295 North Maple Avenue;  
Room 3252I3  
Basking Ridge, NJ 07920

Leslie A. Vial  
Bell Atlantic Telephone Companies  
1320 North Court House Road; 8th Floor  
Arlington, VA 22201

Peter Tannenwald  
Elizabeth Sims Houlton  
Irwin, Campbell & Tannenwald, P.C.  
Attorneys for Conectiv Communi-  
cations, Inc.  
Suite 200  
1730 Rhode Island Avenue, NW  
Washington, DC 20036-3101

David L. Meier  
Cincinnati Bell Telephone Company  
201 E. Fourth Street  
P. O. Box 2301  
Cincinnati, OH 45201-2301

Robert J. Aamoth  
John J. Heitmann  
Kelly Drye & Warren LLP  
Attorneys for The Competitive  
Telecommunications Association  
1200 19th Street, NW; Fifth Floor  
Washington, DC 20036

Genevieve Morelli  
Executive Vice President and  
General Counsel  
The Competitive Telecommunications  
Association  
1900 M Street, NW; Suite 800  
Washington, DC 20036

Janet S. Britton, Staff Attorney  
East Ascension Telephone Company,  
Inc.  
913 South Burnside Avenue  
Gonzales, LA 70737

Emily C. Hewitt  
George N. Barclay  
Michael J. Ettner  
General Services Administration  
1800 F Street, NW, Room 4002  
Washington, DC 20405

Russell M. Blau  
Eric J. Branfman  
Swidler & Berlin, Chartered  
Attorneys for GST Telecom, Inc.  
3000 K Street, NW, Suite 300  
Washington, DC 20007-5116

Gail L. Polivy  
GTE Service Corporation  
1850 M Street, NW, Suite 1200  
Washington, DC 20036

John F. Raposa  
GTE Service Corporation  
600 Hidden Ridge, HQE035J7  
Irving, TX 75038

Jeffrey S. Linder  
Suzanne Yelen  
Kenneth J. Krisko  
Wiley, Rein & Fielding  
Attorneys for GTE Service Corporation  
1776 K Street, NW  
Washington, DC 20006

David W. Zesiger, Executive Director  
Donn T. Wonnell, Counsel for  
Independent Telephone & Telecommu-  
nications Alliance  
1300 Connecticut Avenue, NW;  
Suite 600  
Washington, DC 20036

Russell M. Blau  
Antony Richard Petrilla  
Swidler & Berlin, Chartered  
Attorneys for KMC Telecom, Inc.  
and RCN Telecom Services  
3000 K Street, NW; Suite 300  
Washington, DC 20007

Anne K. Bingaman  
Douglas W. Kinkoph  
LCI International Telecom Corp.  
8180 Greensboro Drive, #800  
McLean, VA 22102

Jerome L. Epstein  
Jodie L. Kelley  
Jenner & Block  
Attorneys for MCI Telecommuni-  
cations Corporation  
601 Thirteenth Street, NW  
Washington, DC 20005

Amy G. Zirkle  
Lisa R. Youngers  
Lisa B. Smith  
MCI Telecommunications Corporation  
1801 Pennsylvania Avenue, NW  
Washington, DC 20006

Richard Karre  
MediaOne  
5613 DTC Parkway  
Suite 700  
Englewood, CO 80111

Bartlett F. Leber  
Joseph S. Paykel  
Mintz, Levin, Cohn, Ferris, Glovsky and  
Popeo, P.C.  
Suite 900  
701 Pennsylvania Avenue, NW  
Washington, DC 20004-2608

Richard A. Askoff  
National Exchange Carrier Association,  
Inc.  
100 South Jefferson Road  
Whippany, NJ 07981

James R. Hobson  
Donelan, Cleary, Wood & Maser P.C.  
National Emergency Number  
Association  
1100 New York Avenue, NW; #750  
Washington, DC 20005-3935

L. Marie Guillory  
National Telephone Cooperative  
Association  
2626 Pennsylvania Avenue, NW  
Washington, DC 20037

Steven T. Nourse  
Assistant Attorney General  
Public Utilities Section  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43215-3793

Robert M. Lynch  
Durward D. Dupre  
Michael J. Zpevak  
William A. Brown  
SBC Communications Inc.  
One Bell Plaza, 30th Floor  
P. O. Box 655521  
Dallas, TX 75202

Leon M. Kestenbaum  
Jay C. Keithley  
H. Richard Juhnke  
Sprint Corporation  
1850 M Street, NW, 11th Floor  
Washington, DC 20036

Julie A. Barrie  
Koteen & Naftalin, L.L.P.  
Attorney for TDS Telecommuni-  
cations Corporation  
1150 Connecticut Avenue  
Washington, DC 20036-4104

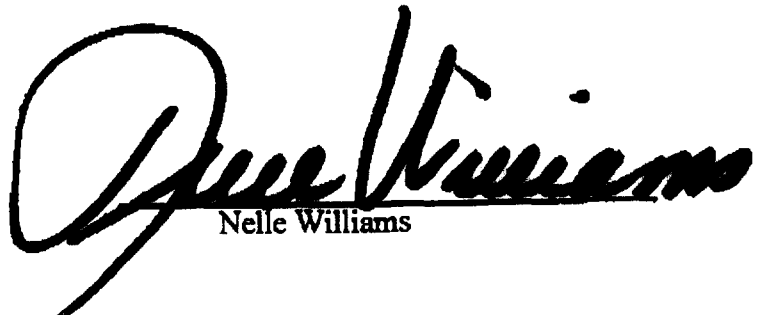
Teresa Marrero  
Senior Regulatory Counsel – Federal  
Teleport Communications Group, Inc.  
Two Teleport Drive  
Staten Island, NY 10311

Lawrence E. Sarjeant  
Linda Kent  
Keith Townsend  
United States Telephone Association  
1401 H Street, NW, Suite 600  
Washington, DC 20005

Catherine R. Sloan  
Richard L. Fruchterman  
Richard S. Whitt  
WorldCom, Inc.  
Suite 400  
1120 Connecticut Avenue, NW  
Washington, DC 20036

Kathryn Marie Krause  
US West Communications, Inc.  
Suite 700  
1020 19th Street, NW  
Washington, DC 20036

**\*\*hand-delivered**



Nelle Williams